

REMARKS

Claims 1-4 and 6-16 are pending in the application and stand rejected.

Rejection under 35 U.S.C §103

Claims 1-4 and 6-16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,790,548 to Sistanizadeh in view of U.S. Patent No. 6,058,431 to Srisuresh et al. In particular, the Examiner finds that, with regard to claim 1, Sistanizadeh discloses all of the claimed limitations with the exception of a service provider bound by a first binding to the address of the gateway on the external network and by a second binding to the address of the service provider on the private network. The Examiner further finds that Srisuresh teaches precisely this limitation "because of the features of network address translation or NAT" and opines that it would have been obvious to the skilled person to combine these two references "because that would provide service providers to determine the addresses specific to the needs of their clients." Applicant has reviewed the newly cited Srisuresh reference with care, paying particular attention to the passages cited, and is compelled to respectfully disagree with the Examiner's characterization of both references, the alleged motivation to combine the references, and the alleged results of such a combination.

Erstwhile, Applicants notes that the Examiner's reading of Sistanizadeh is not clearly set forth in the Action and is thus open to multiple interpretations. As discussed below, however, regardless of which interpretation is adopted, the Sistanizadeh reference simply does not provide the teachings alleged by the Examiner.

More particularly, if the Examiner is equating the claimed client with a PC on a corporate LAN as taught by Sistanizadeh and the claimed service provider with the information service provider of Sistanizadeh, then by the plain teachings of Sistanizadeh the domain name (which Applicant understands the Examiner to read as corresponding to the claimed virtual name) of the service provider is only mapped once, to the mapping contained in the DNS. This is clear because when the PC on the corporate LAN needs to contact the service provider, the PC needs to obtain an IP address from the DHCP server, which it does by contacting the LAN gateway

(i.e. router) via the gateway's known address, not any mapping to the service provider's name. Once the PC has an IP address and the DNS has been updated with a mapping of this address to the name of the PC, the PC obtains the IP address of the service provider by using the DNS to map the name of the service provider to its address. At this point the PC can send messages to the service provider at the service provider IP address. Thus, there is clearly no need for, nor teaching of, binding the name of the service provider twice, and no first and second binding as per the instant claims.

If, conversely, the Examiner understands the claimed client as corresponding to the information service provider of Sistanizadeh and the claimed service provider as corresponding to the PC on the corporate LAN of Sistanizadeh, then the domain name (i.e. virtual name of the LAN PC) is also only mapped once, to the mapping in the DNS after it has been updated by the DHCP server. In this case, then the service provider needs to contact the PC on the LAN, it contacts the DNS to map the name of the PC to its temporary IP address, and then sends messages to the PC at the IP address of the PC. Once again, it is clear that there is no second binding of the PC's name taking place.

Applicant further takes note that Sistanizadeh does not in fact carry out network address translation (NAT) between the corporate LAN and the public network because each PC on the corporate LAN obtains its own IP address (albeit a temporary one) through the DHCP service. Also, as previously noted, there is in fact no disclosure whatsoever in Sistanizadeh of encapsulating communication sessions. The Examiner cites to col. 8, l. 65 – col. 9, l. 6 as well as various elements in the figures, but these merely discuss well-known IP packet routing and simply do not disclose encapsulation. The Examiner once again alleges that “encapsulation is well known in the art of networking which includes routers/gateways, where multiple addresses are embedded/encapsulated in one packet till the packet reaches the destination address after passing through one or plurality of hops (intermediate addresses) from a source address.” Embedding an address in an IP packet is not the same as encapsulating second session data in first session data wherein the two sessions are nested and bound by two separate bindings as per the instant claims. Applicant once again respectfully requests the Examiner to be mindful of the requirements posited by 37 C.F.R. 1.104(c)2 and to therefore clearly and specifically point out

where the above limitations are disclosed in Sistanizadeh or, alternatively, to provide support for his allegation that these limitations are well known in the art.

Applicant further traverses the Examiner's attempted combination of Sistanizadeh with Srisuresh. Srisuresh provides an alternative method of connecting PCs on a LAN to the internet from that of Sistanizadeh. In Sistanizadeh, each PC is provided with its own temporary IP address on the internet, whereas in Srisuresh an external server provides NAT and NAPT services to such PCs. Thus, the only practical way to combine these two approaches (where each PC is dynamically allocated a global IP address indicative of which service provider it is to use) is on a LAN that has a plurality of gateway IP addresses among which the external NAT server can choose one gateway IP address to substitute for the local PC address to indicate which service provider to use. Clearly, such a combination would likewise have no need for two bindings for either the virtual name of the PC or any of the service providers.

Finally, Applicant respectfully traverses the Examiner's proffered motivation to combine these references. The minimum requirements set forth in the Rules and clearly enunciated in the MPEP dictate that "[t]o establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." MPEP §2142. The Examiner has not set forth such motivation in either of the cited references, nor has he invoked the general knowledge of those skilled in the art. The Examiner's general allegation that combining these references would allow service providers "to determine the addresses specific to the needs of their clients" only makes sense in a system using the external NAT server of Srisuresh which, as discussed above, makes little sense when dynamically allocating individual PC IP addresses as in Sistanizadeh.

In view of all of the above, Applicant respectfully submits that claim 1 is in fact novel and nonobvious in view of Sistanizadeh and Srisuresh, and respectfully requests the Examiner to reconsider and allow claim 1.

Claim 10 recites limitations similar to claim 1. The above discussion is therefore equally applicable to claim 10, and Applicant respectfully submits that claim 10 is likewise patentable over the art.

Claims 2-4 and 6-9 depend from claim 1, and claim 11 depends from claim 10. In view of the above discussion, it is submitted that claims 1 and 10 are allowable, and for this reason claims 2-4, 6-9 and 11 are also allowable.

Applicant has attempted to provide as complete a reply as possible to the Examiner's rejections, and thus submits that the application is now in condition for allowance and respectfully urges the Examiner to pass this case to issue. The Examiner is encouraged to contact the undersigned to help speed resolution of any other matters that may move this case to issue.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 08-2025. In particular, if this response is not timely filed, the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136(a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 08-2025.

I hereby certify that this correspondence is being deposited with the United States Post Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on

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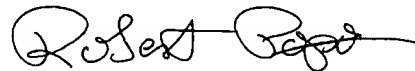


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Respectfully submitted,



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